FAIR POLITICAL PRACTICES COMMISSION
428 J Street • Suite 620 • Sacramento, CA 95814-2329
(916) 322-5660 • Fax (916) 322-0886

February 2, 2015

Jacquie Sullivan
Jacquie Sullivan for City Council 2012
[redacted]

Tracey Reynolds, Treasurer
Jacquie Sullivan for City Council 2012
[redacted]

Re: <u>Warning Letter</u>
FPPC No. 14/295: Jacquie Sullivan; Jacquie Sullivan for City Council 2012; and Tracey Reynolds, Treasurer

Dear Mses. Sullivan and Reynolds:

The Fair Political Practices Commission (the "FPPC") enforces the provisions of the Political Reform Act (the "Act") found in Government Code section 81000, and following.[1] As you know, we received a complaint alleging that you and your committee violated the campaign reporting provisions of the Act, when the committee failed to accurately report activity from one reporting period to the next and failed to disclose subvendor information.

The campaign statements for the periods covering January 1, 2011 through June 30, 2013, were not entirely and properly completed. The Summary Page was incomplete; net figures were not correctly calculated on schedule summaries and incorrectly carried over to the Summary Page, and sub-vendor information was not provided.

The Act requires each campaign statement to contain the total amount of contributions received (including loans), and expenditures made, with detailed itemization if a contribution or expenditure is $100 or more. (Section 84211(a)-(t)(4).) It shall be the duty of each candidate, treasurer, principal officer, and elected officer to maintain detailed accounts, records, bills, and receipts necessary to prepare campaign statements, to establish that campaign statements were properly filed, and to otherwise comply with the provisions of the Act. (Section 84104.) However, because you worked with the Enforcement Division to resolve this issue, filed amendments to correct the inaccuracies, and the fact that you do not have an enforcement history, we are closing this matter with a warning letter.

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[1] The Political Reform Act is contained is Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18110 through 18997 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

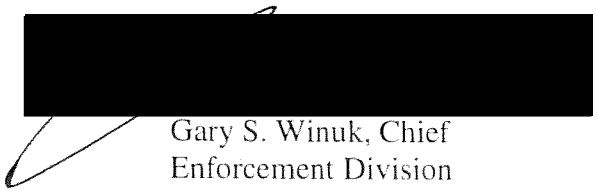
This letter serves as a written warning. The information in this matter will be retained and may be considered should an enforcement action become necessary based on future conduct of newly discovered information. Failure to comply with the provisions of the Act in the future may result in an enforcement action against you and your committee(s).

A warning letter is an FPPC case resolution without administrative prosecution; however, this resolution does not provide you with the opportunity for a probable cause or administrative hearing. If you wish to avail yourself of these proceedings by requesting that your case proceed with prosecution rather than a warning, please notify us within ten days from the date of this letter. Upon this notification, the FPPC will rescind this warning letter and proceed with administrative prosecution of your case. If we do not receive such notification, this warning letter will be posted on the FPPC's website.

The FPPC publishes forms and manuals to facilitate compliance with the Act. If you need forms or a manual, or guidance regarding your obligations, please call the Commission's Toll-Free Advice Line at 1-866-275-3772. Please also visit our website at www.fppc.ca.gov where you will find forms available to be completed interactively.

If you have questions regarding this matter, please contact Teri Rindahl at (916) 327-2018.

Sincerely,



Gary S. Winuk, Chief
Enforcement Division

GSW/tr

cc: Brian Hildreth and Tyler Andrews (via email)